

CHARLES J. SULLIVAN

October 21, 2021

**VIA CM/ECF**

Hon. Carl L. Bucki, Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
Western District of New York  
Robert H. Jackson U.S. Courthouse  
2 Niagara Square  
Buffalo, NY 14202

Re: *Filing of Notice on behalf of Lawlor F. Quinlan III, Esq. of Connors LLP*

Dear Judge Bucki:

Please find attached a notice prepared by Lawlor F. Quinlan III, Esq. of Connors LLP. I am filing this notice on Mr. Quinlan's behalf as he does not have CM/ECF filing privileges with this Court.

Sincerely,

BOND, SCHOENECK & KING, PLLC



Charles J. Sullivan

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

The Diocese of Buffalo, N.Y.,

Debtor.

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)  
) Case No. 20-10322 (CLB)

)  
) Chapter 11  
)  
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**NOTICE REGARDING CONFIDENTIALITY PROTOCOL SET FORTH IN  
ORDER ESTABLISHING AUGUST 14, 2021 DEADLINE FOR FILING PROOFS OF  
CLAIM AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

The Diocese of Buffalo, N.Y. (the “Diocese”), by and through its undersigned special counsel, hereby provides this Notice regarding the Confidentiality Protocol<sup>1</sup> set forth in the *Order Establishing August 14, 2021 Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* [Docket No. 729] (the “Bar Date Order”) and respectfully represents as follows:

1. Paragraph 12 of the Bar Date Order established the Confidentiality Protocol, which requires the Diocese to take certain steps to notify Sexual Abuse Claimants prior to the disclosure of the information contained in such claimant’s Sexual Abuse Proof of Claim.

2. The Diocese made certain disclosures prior to the completion of the notification steps required under the Confidentiality Protocol in order to comply with the Diocese’s obligations under (i) a Memorandum of Understanding with the District Attorneys of the eight counties served by the Diocese and (ii) the Charter for the Protection of Children and Young People.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Bar Date Order.

3. The disclosures consisted of a one-page to three-page excerpt from each of four Sexual Abuse Proofs of Claim. These four Sexual Abuse Proofs of Claim concerned priests who were in active ministry at the time the Sexual Abuse Proofs of Claim were filed.

4. The disclosures consisted of the following:

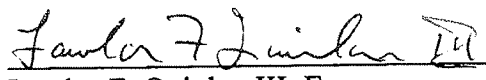
- a. an excerpt from each of three Sexual Abuse Proofs of Claim was sent to the Chair of the Independent Review Board of the Diocese and the relevant District Attorney's office; and
- b. an excerpt from one Sexual Abuse Proof of Claim was sent to the relevant District Attorney's office only.

5. None of these Sexual Abuse Proofs of Claim was provided to any alleged abuser. However, for each of the four Sexual Abuse Proofs of Claim described above, the essential details of the abuse allegations, including the claimants' names, were discussed orally with the priests before they were placed on administrative leave.

6. Upon recognizing that the disclosures did not follow the Confidentiality Protocol established in the Bar Date Order, the Diocese notified counsel for the Official Committee of Unsecured Creditors and, at their request, thereafter provided confirmation that the Proofs of Claim disclosed to the Independent Review Board Chair have been destroyed.

Dated: October 18, 2021  
Buffalo, New York

**CONNORS LLP**

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*Special Counsel for The Diocese of Buffalo, N.Y.*